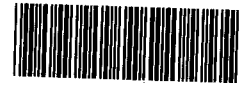


Administration  
Geisinger-Community  
Medical Center  
1822 Mulberry Street  
Scranton PA 18510  
570-969-8240 Tel  
570-969-8951 Fax

Robert P. Steigmeyer  
Chief Executive Officer

# GEISINGER HEALTH SYSTEM

ORIGINAL



SDMS DocID

2197031

November 5, 2012

**VIA FEDERAL EXPRESS – TRACKING NUMBER** 7940 0202 7929

Harry R. Steinmetz (3HS62)  
U.S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

Re: Safety Light Corporation Superfund Site  
Bloomsburg, Pennsylvania (the “Site”)

Dear Mr. Steinmetz:

In response to a letter from Joanne L. Marinelli, Chief, Cost Recovery Branch of the United States Environmental Protection Agency (“EPA”) received on September 6, 2012 by Robert C. Markowski, the following information constitutes the response of Community Medical Center (“CMC”) of Scranton, Pennsylvania for the time period 1945 to present regarding the above-referenced matter. A thirty- (30-) day extension of time to the due date for the CMC response was graciously granted by Attorney Humane Zia on September 13, 2012.

To the best of the knowledge and belief of CMC:

1. The business relationship between CMC and Safety Light or its affiliates is (was) as follows:

**Per Enclosure 4 of the letter from EPA to CMC received on September 6, 2012 (hereinafter “Enclosure 4”), on March 24, 1966, the United States Radium Corporation agreed to accept a shipment of one (1) lot of radioactive scrap for disposal from Community Medical Center Hospital at a cost of Fifteen Dollars (\$15.00). The page labeled “Verbal Order” requires prompt confirmation with a (CMC) purchase order marked “CONFIRMATION” or by signing in the space so designated. No CMC purchase order was included with Enclosure 4, and there is no signature in the designated space.**

**Anne Mullen, Disbursement Supervisor at CMC, has completed a thorough search of all financial records back to the 1960s. She has reported that she found no records pertaining to the Safety Light Corporation or the United States Radium Corporation.**

**Helen Houston was the Manager of Radiology at CMC from November 1, 1964 to July 15, 1969. She is now deceased.**

**CMC has not found any other documents or information regarding such business relationship. CMC does not have business relationship with Safety Light or its affiliates today.**

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2. CMC did send, transport or ship, or otherwise arrange for transportation or shipment of, radioactive materials or items containing radionuclides to the Site as follows:

**According to the document with the heading "Verbal Order" dated March 18, 1966 included in Enclosure 4, the shipping terms were "F.O.B. Bloomsburg, Pa.". It appears that Mr. John L. Beckwith, a former CMC administrator, made this request. Mr. Beckwith is now deceased. Again, the page labeled "Verbal Order" requires prompt confirmation with a (CMC) purchase order marked "CONFIRMATION" or by signing in the space so designated. No (CMC) purchase order was included with Enclosure 4, and there is no signature in the designated space. CMC has not found any other documents or information evidencing such business relationship.**

3. CMC did send, transport or ship, or otherwise arrange for transportation or shipment of, radioactive materials or items containing radionuclides to Safety Light Corporation, U.S. Radium Corporation, Lime Ridge Industries, Inc., USR Industries, Inc., USR Metals, Inc., Metreal Corporation, Isolite Corporation, U.S. Natural Resources, Inc., USR Chemical Products, Inc., USR Lighting Products, Inc., UNATCO Funding Corporation or Shield Source Incorporated as follows:

**Per Enclosure 4, on March 24, 1966, the United States Radium Corporation agreed to accept a shipment of one (1) lot of radioactive scrap for disposal from Community Medical Center Hospital at a cost of Fifteen Dollars (\$15.00). Again, the page labeled "Verbal Order" requires prompt confirmation with a (CMC) purchase order marked "CONFIRMATION" or by signing in the space so designated. No (CMC) purchase order was included with Enclosure 4, and there is no signature in the designated space. CMC has not located any other documents or information regarding any other transportation or shipment of radioactive materials or items containing radionuclides to Safety Light or its affiliates.**

4. As regards questions 2 and 3 above:

- a. The time period during which each transaction occurred was as follows: **The sole transaction of which CMC has any record or information was alleged to have occurred on March 24, 1966, as more specifically set forth on Enclosure 4.**
- b. The purpose or reason for each transaction was as follows: **The purpose of the transaction which was alleged to have occurred on March 24, 1966 was the disposal of one (1) lot of radioactive scrap.**
- c. For each transaction:
  - i. The entity to which CMC sent radioactive materials or items containing radionuclides was as follows:

**Per the document labeled "Verbal Order" dated March 18, 1966, the United States Radium Corporation agreed to accept a shipment of one (1) lot of radioactive scrap for disposal from Community Medical Center Hospital at a cost of Fifteen Dollars (\$15.00). Again, the page labeled "Verbal Order" requires prompt**

**confirmation with a (CMC) purchase order marked “CONFIRMATION” or by signing in the space so designated. No (CMC) purchase order was included with Enclosure 4, and there is no signature in the designated space. CMC has not located any other documents or information regarding any other alleged transportation or shipment of radioactive materials or items containing radionuclides to Safety Light or its affiliates.**

- ii. The description of each radioactive material or item or type of item(s) sent and the amount of radionuclides contained within each such material or item was as follows: **The description from Enclosure 4 is as follows: One Lot of Radioactive scrap for disposal. No further description was found.**
- iii. The method used to send or transport such radioactive material or items to the Site was as follows: **Per the document labeled “Verbal Order” dated March 18, 1966, the United States Radium Corporation agreed to accept a shipment of one (1) lot of radioactive scrap as follows “F.O.B. Bloomsburg, Pa.”.**
- iv. All documents relating to the transaction, including (but not limited to) the type, amount, and transportation/disposal of the radioactive material or items containing radionuclides to the Site are listed on **Exhibit A**, annexed hereto.
- v. The name, title, areas of responsibility, current (or most recent) addresses, and telephone numbers of other persons or parties that have documentation or information pertaining to the transportation/disposal of radioactive material or item(s) containing radionuclides to the Site, and/or the entities identified in Question 3 are as follows:

**Elvin B. Howland  
Compliance Officer  
Community Medical Center  
1800 Mulberry Street  
Scranton, PA 18510  
(570) 969-7195**

**Barbara J. Bossi  
Associate Chief Administrative Officer  
Community Medical Center  
1800 Mulberry Street  
Scranton, PA 18510  
(570) 969-8240**

- d. CMC has the following information regarding the contracting of a hauler that may have been used to transport and/or dispose of radioactive material or item(s) containing radionuclides:

- i. CMC has the following information regarding the name of the person who made such arrangements: **None**
  - ii. CMC has the following information regarding the date(s) on which such arrangements took place: **None**
  - iii. CMC has the following information regarding the nature and quantity of material, including its chemical content, characteristics, physical state, and the process for which the substances was used or the process that generated the substance: **None**
  - iv. CMC has the following information regarding the persons who selected the Site as the place at which materials were disposed and treated: **According to the document with the heading "Verbal Order" dated March 18, 1966 included in Enclosure 4, the shipping terms were "F.O.B. Bloomsburg, Pa." Mr. John L. Beckwith, a former CMC administrator, made this request but it is not known if he also selected the Site at which the materials were allegedly disposed and treated. Mr. Beckwith is now deceased.**
  - v. CMC has the following information regarding the names and employees, officers, owners and agents for each transporter: **None**
- e. CMC arranged for transportation of the following radioactive material to the Site:
- i. CMC has the following information on arrangements made for the following quantity of materials that were used, treated, transported, disposed or otherwise handled by CMC: **None**
  - ii. CMC has the following billing information and documents regarding arrangements made with CMC to generate, treat, store, transport and/or ship materials to the Site: **None**
  - iii. CMC hereby provides the following names, titles and areas of responsibility of any persons, including CMC employees, present and former, who were involved in or would have knowledge of such arrangements: **None**
- f. CMC has the following permits or applications and correspondence between CMC and any regulatory agencies regarding materials transported or disposed of at the Site: **None**
- g. CMC has the following copies of any correspondence between CMC and any third party regarding materials transported or disposed of at the Site: **None**
- h. CMC has the following identities of any documents relating to, or any other person who generated, treated, stored, transported or disposed, or who arranged for the treatment, storage, disposal, or transportation of such materials to the Site: **None**

- i. CMC provides the following predecessors-in-interest, who, during the period 1945 to present, transported to or stored, treated or otherwise disposed of any materials at the Site: **None**

CMC also provides the following details regarding each such predecessors-in-interest's business: **None**

5. CMC generated the following other wastes that are not described in its response to Questions 2 or 3 above, that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite at the Site: **CMC has no information regarding the generation of any other wastes that were allegedly disposed of or reclaimed by the above-referenced companies at the Site.**
6. A detailed description of such other wastes is as follows: **CMC has no information regarding the generation of any other wastes that were allegedly disposed of or reclaimed by the above-referenced companies at the Site.**
7. For each question above, CMC provides the name, title, area of responsibility, current address and telephone number of all persons consulted in preparation of the answers:

**Elvin B. Howland**  
**Compliance Officer**  
**Geisinger Community Medical Center**  
**1800 Mulberry Street**  
**Scranton, PA 18510**  
**(570) 969-7195**

**Barbara J. Bossi**  
**Associate Chief Administrative Officer**  
**Geisinger Community Medical Center**  
**1800 Mulberry Street**  
**Scranton, PA 18510**  
**(570) 969-8240**

For each question above, CMC provides the following name, title, area of responsibility, current address and telephone number of all persons who supplied documents reviewed or relied upon in the course of preparing these answers:

**Elvin B. Howland**  
**Compliance Officer**  
**Geisinger Community Medical Center**  
**1800 Mulberry Street**  
**Scranton, PA 18510**  
**(570) 969-7195**

**Barbara J. Bossi**  
**Geisinger Community Medical Center**  
**Associate Chief Administrative Officer**  
**1800 Mulberry Street**  
**Scranton, PA 18510**  
**(570) 969-8240**

8. CMC provides the following name, title, area of responsibility, current address and telephone number of all persons who may be able to provide more detailed or complete responses to any question contained herein, as well as any additional information or documentation they may have:

**Louise Serpico (retired)**

**Director of Radiology**

**[No other information is available at this time.]**

**John Ramsey**

**Contracted Physicist**

**Bio-Med Associates, Inc.**

**4 Main Street**

**Flemington, NJ 08822**

**[Mr. Ramsey indicated that he has no information regarding this matter.]**

9. CMC provides the following information about other party(ies) who may have information that may assist the Environmental Protection Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site: **None**
10. CMC documents solicited in this information requested are no longer available for the following reason:

- a. The current CMC Document Retention Policy is provided on **Exhibit B**, annexed hereto.

- b. CMC documents were destroyed by the following means: **Unknown**

The approximate date of destruction was as follows: **Unknown**

- c. A description of the type of information that would have been contained in the documents is as follows: **Unknown**

- d. The name, job title and most current address known by CMC of the person(s) who would have produced these documents is as follows: **Unknown**

The name, job title and most current address known by CMC of the person(s) who would have been responsible for the retention of these documents is as follows:

**Unknown**

The name, job title and most current address known by CMC of the person(s) who would have been responsible for the destruction of these documents is as follows:

**Unknown**

Please contact me if you have any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read 'R. P. Steigmeyer', with a long horizontal stroke extending to the right.

Robert P. Steigmeyer  
Authorized Signer

Attachments

Proprietary & confidential  
Not for re-release



**UNITED STATES RADIUM CORPORATION**  
MORRISTOWN, NEW JERSEY

<b>SOLD TO</b>	Community Medical Center Hospital East Branch 316 Coalfax Avenue Scranton, Pennsylvania	<b>ORDER DATE</b>	3-13-66	<b>INVOICE DATE</b>	
<b>SHIP TO</b>		<b>SHIPPED DATE</b>		<b>INVOICE NO.</b>	
		<b>SHIPMENT NO.</b>		<b>OUR ORDER NO.</b>	
		<b>SHIPPED VIA</b>	1	<b>BL 061867</b>	

**TERMS: NET 30 DAYS**

CUSTOMER ORDER NO.	FED. TAX	CUSTOMER ORDER NO.	SALESMAN	CLASS	TAX	WEL. J. FOR	COMPLETE	INVOICED	OTHER SPECIES
telsson			40	63	1-1				
QUANTITY ORDERED	DESCRIPTION OF MATERIAL	U.S. RADIUM JOB NO.	UNIT PRICE	BALANCE ON ORDER	QUANTITY SHIPPED	AMOUNT			
1	lot Radioactive scrap for disposal		15.00 lot		1 lot disposal				
2									
3									

DATE ENTERED	INSPECTION REQUIRED	ART SCHEDULE	PROOF SENT	PROOF APPROVED	RECEIVED PROOF DATED	DEPT.	READ
3-22-66							
MATERIAL SOURCE & ANALYSIS		SOURCE & ANALYSIS		SCHEDULE OF SHIPMENTS			
1 2 3				Del. for billing purposes			
MASTER REMARKS OR SPECIAL INSTRUCTIONS:							

J. Eckenwith  
J. W. Taylor

DATE	ITEM	P.T. NO.	INVOICE NO.	QUANTITY	DATE	ITEM	P.T. NO.	INVOICE NO.	QUANTITY	DATE	ITEM	P.T. NO.	INVOICE NO.	QUANTITY

FORM NO. 39-1

S. PLANT MANAGER ORDER COPY

SL000230

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Not for re-release

ERBAL ORDER

MAR 18 1966

UNITED STATES RADIUM CORPORATION

P.O. Box 246

Morristown, New Jersey 07960

Telephone 201-539-4000

TWX 201-538-6870

Attention: Dave Derr ...

Please enter following order:

March 18, 1966

SOLD  
TO

Community Medical Center Hospital  
East Branch  
316 Coalfax Avenue  
Scranton, Pennsylvania

PLEASE CONFIRM PROMPTLY WITH  
YOUR PURCHASE ORDER MARKED:

**CONFIRMATION**

OR BY SIGNING BELOW:

SHIP  
TO

**BL** 064867 MAR 18

COMPANY

DATE

SIGNATURE


CUSTOMER ORDER NO. Telecon	SHIP VIA	DATE REQUIRED	F.O.B. Bloomsburg, Pa.	TERMS Net 30 days
ORDERED BY J. Beckwith	ACCEPTED BY E. Burtsavage	DATE 2/28	SALES CODE Lab C1v 10	SALESMAN

QUANTITY	DESCRIPTION	PRICE	EXTENSION
One Lot	Radioactive scrap for disposal  <i>Job 63 Initial 3/22 1-1 For Billing Purposes ONLY</i> <b>CONFIRMATION REQUIRED</b>	\$15.00/lot	

TWT/rel

SL000231

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	<b>Administrative Policy and Procedure Manual</b>	<b>Records Management / Retention</b>
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**POLICY:**

It is the policy of Community Medical Center Healthcare System and its affiliates ("CMC") to have in place a records management policy addressing appropriate retention procedures for corporate, hospital and patient records.

**PROCEDURE:****RECORDS REVIEW AND RETENTION:****A. Annual Review**

Each department will conduct a file review and purge process on at least an annual basis. This process consists of identifying and destroying unnecessary duplicate and multiple copies of documents and reviewing and destroying documents which exceed the required retention period.

**B. Destruction**

Annually, it is the responsibility of the individual or individuals delegated by the Chief Executive Officer, corresponding vice president, department director or designee, to review the documents to determine which records have reached their disposal date and to arrange for destruction of documents. All confidential documents must be shredded, mutilated or incinerated.

**C. Confidentiality**

Patient medical records, employee medical records, credentialing and peer review records are subject to confidentiality restrictions and HIPAA regulations, and must be stored securely and destroyed in a manner that ensures confidentiality, such as shredding, mutilation or incineration.

**D. Electronic Records**

E-mail: Confidential electronic messages will not be forwarded or disclosed to other parties unless there is a clear business need to do so. Care will be taken in addressing electronic messages in order to avoid inadvertently sending to the wrong person.

Confidential Information: Confidential information will not be transmitted to individuals or companies not authorized to receive that information or who do not have a need to know the information. Steps will be taken to ensure that only the intended recipient will receive confidential information, including patient information, via facsimile machine.

**E. Investigations and Litigation**

Upon the receipt of notice regarding the initiation of an investigation or the service of legal process, destruction of potentially relevant documents shall cease pending further notice that the investigation or litigation has been concluded.

Adopted: 7/97

Reviewed: 1/05, 1/06, 6/07, 2/08, 8/09, 8/10, 12/11

Revised: 1/04, 12/08

**1. CORPORATE RECORDS RETENTION SCHEDULE:**

Retention Period	
<ul style="list-style-type: none"> <li>Articles of Incorporation</li> <li>Certificate of Incorporation</li> <li>Amendments to Certificate of Incorporation</li> <li>Any other corporate documents filed with the Department of State, Corporation Bureau</li> </ul>	Permanent
<ul style="list-style-type: none"> <li>Annual Reports</li> <li>Other corporate Reports</li> <li>Board of Directors meeting minutes and notes (except for Board Resolutions and/or other authentication purposes)</li> <li>Board Committee meeting minutes/notes</li> <li>Corporate Organization Charts</li> <li>Organization Bylaws</li> </ul>	10 years, unless required for the authentication of action taken, which shall be permanent.

**2. HOSPITAL RECORDS RETENTION SCHEDULE:**


<ul style="list-style-type: none"> <li>Minutes of Service Organization Meetings</li> <li>Minutes of standard Committee Meetings (such as, but not limited to):               <ul style="list-style-type: none"> <li>(a) Procedure Committee</li> <li>(b) Performance Improvement Committee</li> <li>(c) Patient Education Committee</li> <li>(d) Policy Committee</li> </ul> </li> <li>Incidents of medication errors</li> <li>Changes in Procedure Manual</li> <li>Changes in Policy Manual</li> </ul>	7 years
<ul style="list-style-type: none"> <li>Time Schedules</li> <li>Daily Census Records</li> </ul>	5 years
<ul style="list-style-type: none"> <li>Patient assignment sheets</li> <li>Daily staffing sheets</li> </ul>	1 year

Adopted: 7/97

Reviewed: 1/05, 1/06, 6/07, 2/08, 8/09, 8/10, 12/11

Revised: 1/04, 12/08

Page 2 of 3

	<b>Administrative Policy and Procedure Manual</b>	<b>Records Management / Retention</b>
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### **3. PATIENT RECORDS RETENTION SCHEDULE:**

- Patient records, whether originals, reproductions or microfilm, will be kept on file for a minimum of seven (7) years following the discharge of a patient. This includes both inpatient and outpatient records.
- If the patient is a minor, records shall be kept on file until his maturity (18 years in Pennsylvania) and then for seven (7) years, or as long as the records of adult patients are maintained. If records of minors cannot be easily identified, then all records will be maintained for twenty-five (25) years.
- All infant footprints shall be retained in the original record or on microfilm for the period stated above.
- All records will be treated as confidential. Only authorized personnel will have access to the records. The written authorization of the patient will be presented and maintained in the original record as authority for release of medical information outside the hospital.
- Medical records are the property of the hospital and will not be removed from the hospital premises, except for court purposes.
- Records retained by the Risk Management Department shall be kept on file in a safe, locked area until released by the Risk Manager. After authorized release, records shall be processed according to policy.

*For additional information, see attached "Pennsylvania Department of Health Guidelines to Retention of Hospital and Medical Records".*

*6/97 – Policy developed in collaboration with Medical Records, Risk Management  
6/97 – Nursing Policy "Maintenance of Required Records" combined in this policy.*

Adopted: 7/97  
Reviewed: 1/05, 1/06, 6/07, 2/08, 8/09, 8/10, 12/11  
Revised: 1/04, 12/08

Page 3 of 3

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From: (570) 969-8010  
Barbara Croll  
Community Medical Center  
1822 Mulberry Street

Scranton, PA 18510

Origin ID: AVPA



J12201209200325

SHIP TO: (570) 969-8240  
**Harry R. Steinmetz**  
**US EPA, Region III**  
**1650 ARCH ST**

BILL SENDER

**PHILADELPHIA, PA 19103**

Ship Date: 05NOV12  
ActWgt: 0.3 LB  
CAD: 5081986/INET3300

Delivery Address Bar Code



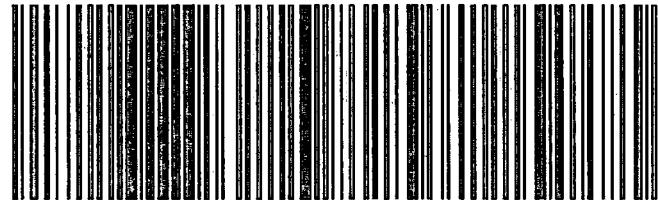
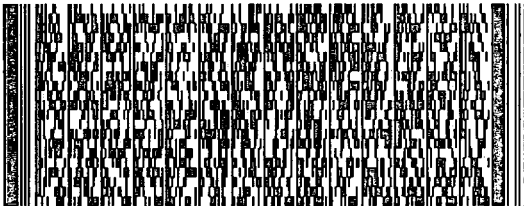
Ref # 950  
Invoice #  
PO #  
Dept #

**TUE - 06 NOV A1**  
**PRIORITY OVERNIGHT**

TRK# 7940 0202 7929  
0201

**ZR REDA**

**19103**  
PA-US  
**PHL**



515G1/6713/AA44

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